

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No.: 05-CV-11080-GAO

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

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| JANE DOE, |) |
| Plaintiff, |) |
| |) |
| v. |) |
| |) |
| SHERIFF OF ESSEX COUNTY d/b/a |) |
| ESSEX COUNTY CORRECTIONAL ALTERNATIVE |) |
| CENTER, FRANK G. COUSINS, JR., Individually, |) |
| and in his Official Capacity as Sheriff of Essex County, |) |
| ANDOVER HOUSING AUTHORITY, and |) |
| CHRISTINE METZEMAKERS, Individually, and in her |) |
| Official Capacity as Executive Director of the Andover |) |
| Housing Authority, |) |
| Defendants. |) |
| |) |

**PLAINTIFF'S ASSENTED TO MOTION FOR AN EXTENSION OF TIME WITHIN
WHICH TO FILE AN OPPOSITION TO THE DEFENDANTS MOTION TO DISMISS**

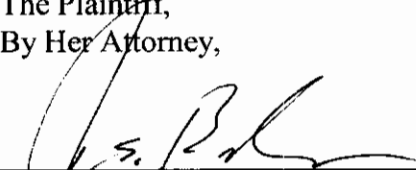
Pursuant to Fed. R. Civ. P. 6(b), the Plaintiff in the above captioned matter with the assent of the defendants/moving parties, Sheriff of Essex County d/b/a Essex County Correctional Alternative, Frank G. Cousins Jr., in his official capacity and Frank G. Cousins Jr., in his individual capacity ["the Defendants"], hereby request an order allowing counsel for the Plaintiff an extension up to and including July 20, 2005 to file and to serve his opposition to the Defendants' Motion to Dismiss. In further support of this motion, the parties state the following.

1. Counsel for the Plaintiff was served with the Defendants' Motion to Dismiss on June 22, 2005.

2. This case involves complex allegations concerning numerous Defendants.
3. Counsel requires additional time within which to prepare his opposition.
4. Counsel for the Defendants has assented to this motion.
5. No party will be prejudiced by the requested extension.

Wherefore, the Plaintiff respectfully requests that the Court grant this motion.

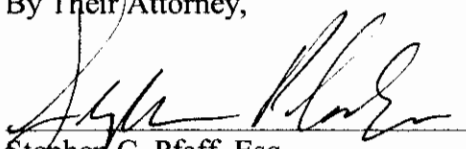
Respectfully Submitted,
The Plaintiff,
By Her Attorney,



Jeffrey S. Beeler, Esq. (BBO# 563678)
HEINLEIN & BEELER, P.C.
207 Union Street
South Natick, MA 01760
(508) 655-8700 (Tel)
(508) 655-2700 (Fax)

Assented to:

Sheriff of Essex County d/b/a Essex County Correctional Alternative,
Frank G. Cousins Jr., in his official capacity and
Frank G. Cousins Jr., Individual,
By Their Attorney,



Stephen C. Pfaff, Esq.
Merrick, Louison & Costello
67 Batterymarch Street
Boston, MA 02110

Andover Housing Authority, Christine Metzmakers, Individually,
and in her Official Capacity as Executive Director of
the Andover Housing Authority



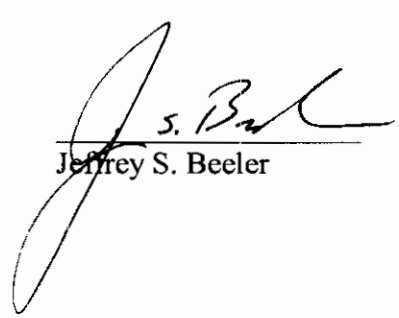
Martin Rooney, Esq.
Curley & Curley
27 School Street
Boston, MA 02108

CERTIFICATE OF SERVICE

I hereby certify that on this 27 day of June, 2005, I served a true and accurate copy of
the foregoing document by first class mail, postage prepaid on:

Martin Rooney, Esq.
Curley & Curley
27 School Street
Boston, MA 02108

Stephen C. Pfaff, Esq.
Merrick, Louison & Costello
67 Batterymarch Street
Boston, MA 02110



Jeffrey S. Beeler